

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ROSLYN LA LIBERTE,

Plaintiff,

- against -

JOY REID,

Defendant.

Case No.: 1:18-cv-05398-DLI-VMS

**DECLARATION IN SUPPORT OF
DEFENDANT'S MOTION TO
REVOKE THE *PRO HAC VICE*
ADMISSION OF L. LIN WOOD**

JOHN H. REICHMAN declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of Johnreichmanlaw LLC, attorneys for Defendant Joy Reid, along with Gibson, Dunn & Crutcher LLP. I submit this declaration in support of Defendant's motion to revoke the *pro hac vice* admission of L. Lin Wood, one of Plaintiff's attorneys (the "Motion").

2. The legal arguments supporting this application are set forth in the accompanying Memorandum of Law. In this Declaration, I set out the factual support for the Motion. The documents attached hereto are all a matter of public record.

Background

3. Mr. Wood's motion for admission *pro hac vice* was granted at the outset of this case on October 11, 2018. Order at 10/11/18. At the time, two of Mr. Wood's former partners also moved for and were granted *pro hac vice* admission. *Id.*

4. Mr. Wood's former partners subsequently withdrew from this action. Dkt. 42. They also sued Mr. Wood for fraud, among other claims for relief.¹

¹ Annexed hereto as **Exhibit A** is a true and correct copy of the verified complaint filed by Mr. Wood's law partners on August 31, 2020.

5. Mr. Wood has had scant personal involvement in the case. One of his former partners was primarily responsible for opposing Defendant’s motion to dismiss and successfully arguing the appeal of that dismissal in the Second Circuit. Mr. Wood did not participate in any of the attorney conferences regarding scheduling and discovery prior to the January 11 conference—Defendant’s counsel was repeatedly informed that Mr. Wood was too busy attending to his election lawsuits to participate in this action.

Mr. Wood’s Posts Regarding the Election and Insurrection

6. The accompanying Memorandum of Law argues that Mr. Wood’s *pro hac vice* admission should be revoked because, among other things, he has acted and is acting to subvert the United States Constitution² and the rule of law, violated his ethical obligations under the New York Rules of Professional Conduct (“RPC”) and the New York Constitution, violated Federal Rule of Civil Procedure 11 and RPC 3.1, falsely attacked the Chief Justice of the United States Supreme Court, has recently been disciplined in another state court, and made misrepresentations to this Court. We submit the following in support of this proposition.

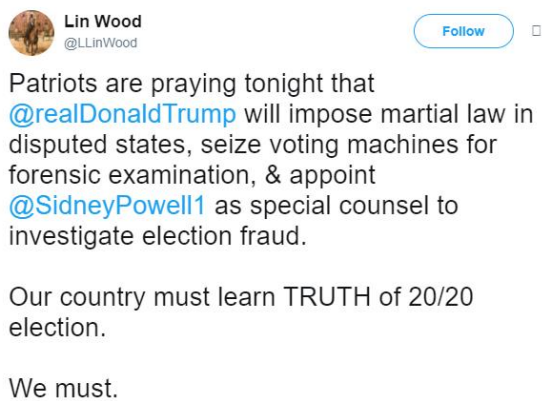
7. On December 2, 2021, Mr. Wood led a rally in Georgia, where he called for the imprisonment of the Georgia Governor and Secretary of State for carrying out their duty of counting Georgia’s votes in the presidential election.³ He instructed those present to “go to the [Georgia] Governor’s mansion” and “circle it” to force the Georgia legislature into a special session.

8. Mr. Wood had 1.1 million Twitter followers before he was banned from Twitter. He used Twitter to claim that the 2020 election was fraudulent; then-President Elect Biden “stole”

² Annexed hereto as **Exhibit AA** is a true and correct copy of the “Oath on Admission” attorneys must take to practice in federal court.

³ A true and correct copy of the video where Mr. Wood made these statements can be found here: <https://www.youtube.com/watch?v=ep1yCTpMJvc> (last visited January 22, 2021).

the 2020 election; and then President Trump should declare martial law to remain in power.⁴ The following are some examples of his social media posts⁵:



6:10 PM - 19 Dec 2020

⁴ Annexed hereto as **Exhibit B** is a true and correct copy of a January 17, 2021 article from *The Washington Post*.

⁵ Because Twitter has suspended Mr. Wood's account, the public no longer has access to all of Mr. Wood's tweets.



Lin Wood @LLinWood · 6m
Time to clean house in 2021.

...

Let the military LOCK THEM ALL UP.

The crime is treason. They are traitors.

It must be done if our country is to survive & once again serve as a bright beacon of light that provides hope of freedom to the world.



Lin Wood @LLinWood · 12m

(3) These groups aspire to the goals of Communism. A ruling elite & an oppressed class of people who exist to serve those in power.

When arrests for treason begin, put Chief Justice John Roberts, VP Mike Pence @VP @Mike_Pence, & Mitch McConnell @senatemajldr at top of list.

[Show this thread](#)



Lin Wood
@LLinWood

Folgen



We CANNOT trust courts to save our freedom. They are IGNORING massive evidence of fraud & unlawful election procedures.

We must trust [@realDonaldTrump](#) to take necessary action to save country. Just like Abraham Lincoln had to do.

Remember: We The People have all the power.



12:40 - 13. Dez. 2020

9. On January 1, 2021, Mr. Wood tweeted that then-Vice President Pence should face arrest and “execution by firing squad”:



10. On January 6, 2021, when the Capitol was under siege, Mr. Wood posted the following tweets throughout the day. At 11:23 a.m., he tweeted⁶:



⁶ Annexed hereto as **Exhibit C** is a true and correct copy of a January 12, 2021 article from *The New York Times* establishing the timeline with respect to the siege of the Capitol.

11. At 11:57 a.m., when the mob was gathering for its eventual assault on the Capitol, Mr. Wood tweeted:



12. At 12:47 p.m., as individuals were poised to breach the Capitol, Mr. Wood tweeted that the Vice President was a traitor for attempting to perform his constitutional duties:



13. As the siege of the Capitol was ongoing, Mr. Wood tweeted to his 1.1 million followers, encouraging them to occupy the Capitol and fight for President Trump:



14. The social media account of Ashli Babbitt, a woman killed on January 6 when she tried to invade the House chamber, demonstrates that she followed Mr. Wood on Twitter and often retweeted his posts.⁷ Ms. Babbitt’s final tweet before her death was a retweet of one of Mr. Wood’s posts on the day of the insurrection. The tweet contained what Mr. Wood deemed his “MUST BE DONE LIST”:

⁷ Annexed hereto as **Exhibit D** is a true and correct copy of a January 6, 2021 article from *Law&Crime*.



15. Many prominent right wing conspiracy groups who were part of the mob at the Capitol have voiced their support for Mr. Wood, including the “Three Percenters”⁸ and QAnon.⁹ The Three Percenters posted a short manifesto expressing their preparedness “to take back our country from the pure evil that is conspiring to steal our country away from the American people.” Ex. F at 5. That statement praised Mr. Wood as an “inspirational figure[] in th[at] looming battle.” *Id.*

16. At the insurrection, the Three Percenters raised their “Release the Kraken” flag, shown below, which is a reference to comments made by Mr. Wood and his co-counsel in the election litigations, Sidney Powell.¹⁰ Ms. Powell and Mr. Wood are known as the “‘Kraken’ lawyers.”¹¹



⁸ Annexed hereto as **Exhibit E** is a true and correct copy of a January 9, 2021 article from *The Guardian*. Annexed hereto as **Exhibit F** is a true and correct copy of a January 9, 2021 article from *The Washington Post*.

⁹ Annexed hereto as **Exhibit G** is a true and correct copy of a November 24, 2020 article from *CBS News*.

¹⁰ A true and correct copy of the video where Mr. Wood references the “Kraken” can be found here: <https://www.youtube.com/watch?v=TaiL4KZOGRI> (last visited January 22, 2021).

¹¹ Annexed hereto as **Exhibit H** is a true and correct copy of a January 10, 2021 article from *BBC News*.

17. In the wake of the Capitol siege, Mr. Wood claimed Antifa and Black Lives Matter were responsible for the insurrection¹²:



18. In one instance, Mr. Wood posted a photograph of a man named Josiah Colt, suggesting he was not a supporter of then-President Trump:



¹² Annexed hereto as **Exhibit HH** is a true and correct copy of a January 23, 2021 article from *The New Yorker*.

19. Mr. Colt, a Trump supporter, confirmed he was the man in the photograph and sitting in Vice President Pence’s chair in the Senate.¹³

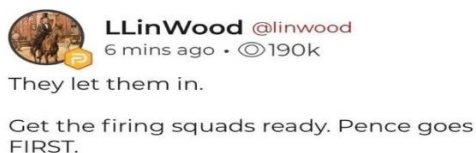
20. Mr. Wood also tweeted a photo of Jake Angeli, *see supra*, ¶ 17, the “QAnon Shaman” who occupied the Senate floor.¹⁴ Mr. Wood claimed Angeli was part of Antifa, writing “Indisputable photographic evidence that antifa violently broke into Congress today. . . .” *Id.*

21. Mr. Wood repeated his claims about Antifa to this Court at the January 11, 2021 conference.¹⁵

22. Mr. Wood’s Twitter account was terminated on Thursday, January 7. One of his final tweets accused Vice President Pence of being a “TRAITOR, a Communist Sympathizer & a Child Molester”:



23. Following his Twitter suspension, Mr. Wood turned to the social media sites Parler and Telegram to communicate with his followers. On Thursday, January 7, Mr. Wood posted the following on Parler:



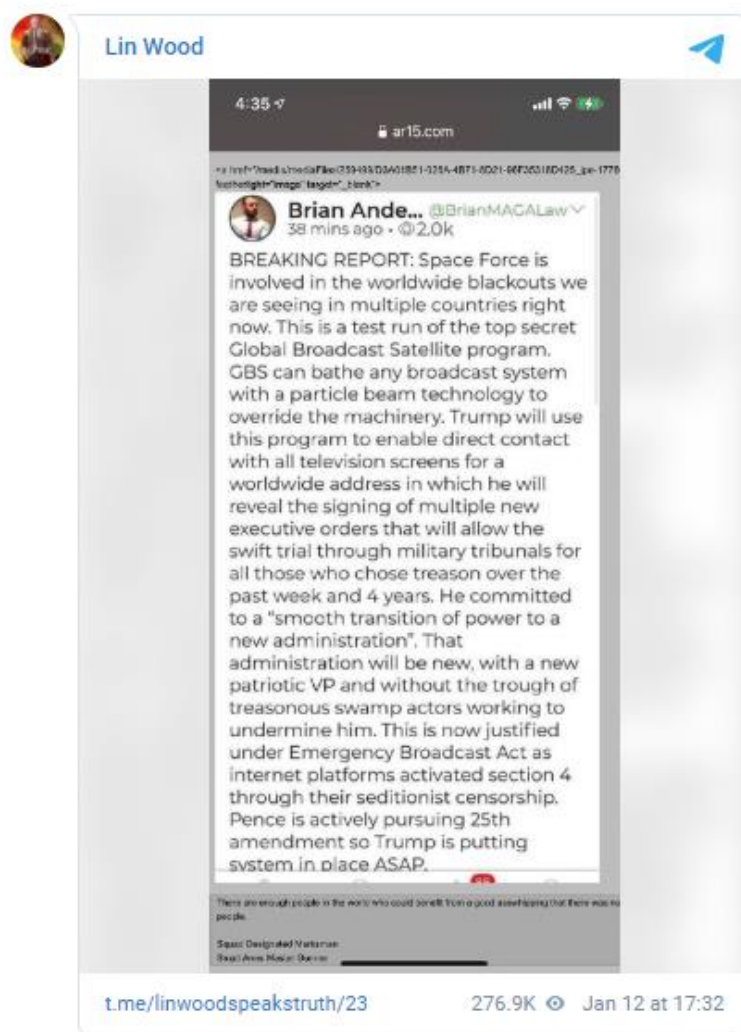
¹³ Annexed hereto as **Exhibit I** is a true and correct copy of a January 13, 2021 article from *CNN*.

¹⁴ Annexed hereto as **Exhibit J** is a true and correct copy of a January 17, 2021 article from *The New Yorker*. A true and correct copy of the video accompanying the article can be found here: <https://www.newyorker.com/news/video-dept/a-reporters-footage-from-inside-the-capitol-siege> (last visited January 22, 2021).

¹⁵ Annexed hereto as **Exhibit K** is a true and correct copy of the transcript of the hearing on January 11, 2021.

24. This call for the execution of the Vice President was directed toward user feeds nearly three million times¹⁶ and was viewed at least 788,000 times.¹⁷ According to Fox News, Mr. Wood is being investigated by the United States Secret Service concerning his death threats against Mr. Pence.¹⁸

25. Mr. Wood has remained active on social media, primarily through Telegram, to this day:



¹⁶ Annexed hereto as **Exhibit L** is a true and correct copy of a January 7, 2021 article from *The Washington Post*.

¹⁷ Annexed hereto as **Exhibit M** is a true and correct copy of a January 9, 2021 article from *The New York Times*.

¹⁸ Annexed hereto as **Exhibit MM** is a true and correct copy of a January 10, 2021 article from *Fox News*.



Lin Wood



Please be prepared to listen to President Trump or other legitimate Patriots in our government when they speak to you through the Emergency Broadcast System. They will be telling you the TRUTH. So listen carefully.

t.me/linwoodspeakstruth/26

308.8K Jan 12 at 17:36



Lin Wood



The "election" of Biden was a fraud. The US propaganda media has hidden that truth to many in America. Almost half the country has been deceived. People in other countries around the world know that Biden cheated and that Trump won because they have been exposed to more truth.

Use your common sense. Do you really think Biden got more votes than Obama and Hillary??? He did not campaign. His prior runs for office were dismal failures. He had no crowds at rallies. Look at Trump. His rallies were jam packed. There was a 92 mile caravan of supporters in Arizona. Do you really think he lost Arizona??? No way!

Think for yourself. Ignore the lies of the media.

Trump won a landslide re-election. That is the truth.

Telling you that Biden won is telling you a lie.

Trust that ultimately truth prevails over lies.

Trump will be President for at least 4 more years. He won.

So be patient. Every lie will be revealed. It takes time because there have been so many lies for so many years.

Trust God. Trust Truth. Trust Trump.

t.me/linwoodspeakstruth/69

394.3K Jan 18 at 10:47



Lin Wood



Vice President Pence must resign today. Pence is on videos captured by FBI. Discussions about murdering judges. Roberts was involved. So was Hillary Clinton.

t.me/linwoodspeakstruth/102

248.5K Jan 19 at 09:03



Lin Wood



Justice Scalia learned of the plan to kill members of the judiciary. He reported it to the White House. Shortly thereafter, Justice Scalia was murdered.

t.me/linwoodspeakstruth/106

186.7K Jan 19 at 09:09



Lin Wood



Chief Justice John Roberts must resign today. Over the past several weeks, I have met with a courageous whistleblower who has risked his life to tell you the truth. Jeffrey Epstein arranged for the adoption of Roberts' children. Roberts used the children to gain entry into the cabal of power & influence. FBI, Rod Rosenstein & Crowdstrike knew it all.

t.me/linwoodspeakstruth/100

245.3K Jan 19 at 08:58



Lin Wood



Hillary Clinton thought she had rigged the 2016 election. The plan after her election was to kill federal judges so that Hillary could stack the judiciary. US Supreme Court targeted. FBI was complicit.

t.me/linwoodspeakstruth/104

213.4K Jan 19 at 09:06



Lin Wood

I have previously provided the entire interview of the whistleblower to agents of the U.S. Secret Service. His evidence reveals a level of evil, perversion, & criminality at the highest levels of government that is so shocking that it is hard to believe.

Believe it.

The whistleblower is a truth-giver. When he speaks, listen carefully.

t.me/linwoodspeakstruth/108

194.6K Jan 19 at 09:15



Lin Wood

The whistleblower has been brutally tortured and he and his wife have lived in fear of death. The guilty parties thought their threats silenced him. Further damning evidence was sealed for alleged National Security purposes in a federal court in Maryland. False charges were brought against the whistleblower. He decided to risk his life to speak truth. He did so as a believer in God. He is a hero. In time, I pray that he will be pardoned and honored for his courage in revealing the truth. If FBI or other nefarious actors harm him now they will only further indict themselves and prove their guilt. Pray for Psalm 91 protection for this brave man and whistleblower. - Lin 🙏



t.me/linwoodspeakstruth/109

146.9K Jan 19 at 10:01

Mr. Wood's Frivolous Filings in Numerous Courts

26. After the presidential election, Mr. Wood and his co-counsel, Sidney Powell, filed four lawsuits in swing states, Georgia, Wisconsin, Arizona, and Michigan, where they claimed voter fraud and sought to overturn the election results. *See Feehan v. Wisc. Elections Comm'n*, No. 20-cv-1771, 2020 WL 7250219 (E.D. Wis. Dec. 9, 2020)¹⁹; *Bowyer v. Ducey*, No. 20-cv-

¹⁹ Annexed hereto as **Exhibit N** is a true and correct copy of the complaint filed by Mr. Wood in the Eastern District of Wisconsin, *Feehan v. Wisc. Elections Comm'n*, No. 20-cv-1771, seeking to overturn the election results in

02321, 2020 WL 7238261 (D. Az. Dec. 9, 2020); *Pearson v. Kemp*, No. 1:20-cv-4809, 2020 WL 7040582 (N.D. Ga. Dec. 7, 2020)²⁰; *King v. Whitmer*, No. 20-cv-13134, 2020 WL 7134198 (E.D. Mich. Dec. 7, 2020).²¹ Each of these cases was dismissed. Mr. Wood also filed a *pro se* action in Georgia, in which the district court denied his motion for a temporary restraining order. *L. Lin Wood Jr. v. Raffensperger*, No. 1:20-cv-04651, 2020 WL 6817513 (N.D. Ga. Nov. 20, 2020).²² The pleadings, oral arguments, and court decisions in these and other election cases are catalogued by the Moritz College of Law at Ohio State University.²³ The Michigan action led to sanctions motions being filed against Mr. Wood. The City of Detroit’s motion sought Mr. Wood’s disbarment and disqualification.²⁴

27. In *Page v. Oath, Inc.*, the Superior Court of Delaware *sua sponte* issued a “Rule to Show Cause” with respect to whether Mr. Wood’s *pro hac vice* status should be revoked because of his role in the Wisconsin action and the *pro se* lawsuit in Georgia.²⁵ After providing Mr. Wood

Wisconsin (the “Wisconsin Action”). Annexed hereto as **Exhibit O** is a true and correct copy of the decision dismissing the Wisconsin Action.

²⁰ Annexed hereto as **Exhibit P** is a true and correct copy of the complaint Mr. Wood filed in the Northern District of Georgia, *Pearson v. Kemp*, No. 1:20-cv-4809, seeking to overturn the election results in Georgia (the “Georgia Action”). Annexed hereto as **Exhibit Q** is a true and correct copy of the decision dismissing the Georgia Action.

²¹ Annexed hereto as **Exhibit R** is a true and correct copy of the complaint filed by Mr. Wood in the Eastern District of Michigan, *King v. Whitmer*, No. 20-cv-13134, seeking to overturn the election results in Michigan (the “Michigan Action”). Annexed hereto as **Exhibit S** is a true and correct copy of the decision denying Plaintiffs relief in the Michigan Action.

²² Annexed hereto as **Exhibit T** is a true and correct copy of the complaint Mr. Wood filed *pro se* in Georgia, *L. Lin Wood Jr. v. Raffensperger*, No. 20-cv-4651, seeking to overturn the election results in Georgia (the “Georgia *Pro Se* Action”). Annexed hereto as **Exhibit U** is a true and correct copy of the decision denying Plaintiffs relief in the Georgia *Pro Se* Action.

²³ A true and correct link to the election case database at Ohio State University can be found here: https://electioncases.osu.edu/case-tracker/?sortby=filing_date_desc&keywords=&status=all&state=all&topic=25 (last visited January 23, 2021).

²⁴ Annexed hereto as **Exhibit V** is a true and correct copy of the City of Detroit’s motion for sanctions, disqualification, and disbarment of Mr. Wood filed in the Michigan Action.

²⁵ Annexed hereto as **Exhibit W** is a true and correct copy of the Order issued by the Superior Court of Delaware in *Page v. Oath, Inc.*, No. S20C-07-030, for Mr. Wood to show cause why he should not be disqualified from practicing law in a pending Delaware action (the “Delaware Action”).

with an opportunity to respond to its show cause order, the Superior Court in Delaware revoked his *pro hac vice* status.²⁶

Mr. Wood's False Attacks on Chief Justice John Roberts

28. As set forth in the accompanying memorandum of law, Mr. Wood has repeatedly falsely attacked Chief Justice John Roberts on social media.

29. Mr. Wood has stated that the Chief Justice arranged the “illegal adoptions” of two children through Jeffrey Epstein. *See* Ex. Y at 4.

30. Mr. Wood linked the Chief Justice with the death of Justice Scalia and with pedophilia. *See id.* at 3-4.

31. Mr. Wood asked if the Chief Justice was a member of any “club or cabal requiring minor children as an initiation fee” in the following tweets²⁷:

A couple of more questions for Chief Justice John Roberts:

(1) You are recorded discussing Justice Scalia’s successor before date of his sudden death. How did you know Scalia was going to die?

(2) Are you a member of any club or cabal requiring minor children as initiation fee? pic.twitter.com/jGxfgLCK4D

— Lin Wood (@LLinWood) December 31, 2020

I have linked Roberts to illegal adoption, Jeffrey Epstein, pedophilia & prior knowledge of Scalia’s death.

— Lin Wood (@LLinWood) December 31, 2020

32. In another tweet, Mr. Wood implied that the Chief Justice said, during a phone call in August, that President Trump is a “m-----f-----” who could not be allowed to have another term:

²⁶ Annexed hereto as **Exhibit X** is a true and correct copy of the Order issued in the Delaware Action revoking Mr. Wood’s *pro hac vice* admission in Delaware.

²⁷ Annexed hereto as **Exhibit Y** is a true and correct copy of a December 31, 2020 article from *The Daily Beast*.



Lin Wood
@LLinWood

...

The People have list of questions for C.J. Roberts based on bizarre votes on major cases starting with Obamacare. But let's ask him just two:

1. Are you the John Roberts on Epstein flight logs?
2. Did you say about [@realDonaldTrump](#) "the mother f#*ker would never be re-elected."

9:55 PM · Dec 17, 2020 · Twitter for iPhone

33. Mr. Wood alleged that the Chief Justice was being blackmailed, including in the tweets below, which were retweeted by Ashli Babbitt shortly before her death at the Capitol:



34. Mr. Wood's attacks on Justice Roberts have continued to this day via the social media website Telegram:



[Lin Wood](#)

Chief Justice John Roberts must resign today. Over the past several weeks, I have met with a courageous whistleblower who has risked his life to tell you the truth. Jeffrey Epstein arranged for the adoption of Roberts' children. Roberts used the children to gain entry into the cabal of power & influence. FBI, Rod Rosenstein & CrowdStrike knew it all.

t.me/linwoodspeakstruth/100

245.3K 👁 Jan 19 at 08:58

Mr. Wood's Lack of Candor to This Court

35. Another ground for the instant motion is Mr. Wood's lack of candor to this Court at the conference on January 11. The transcript of the conference is annexed hereto as Exhibit K. On January 11, one of the false statements Mr. Wood told this Court was that he "never advocated that anyone should break the law." Ex. K at 15.

36. Mr. Wood encouraged the conduct of individuals who committed federal offenses by breaking into the Capitol to unseat our duly elected representatives and prevent the casting of electoral college votes and the peaceful transfer of power. As of the date of this declaration, over 100 people have been arrested and so charged, with the FBI investigating hundreds more.²⁸

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 25, 2021



JOHN H. REICHMAN

²⁸ Annexed hereto as Exhibit Z is a true and correct copy of a January 19, 2021 article from CNN.